

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

RYANAIR DAC,

*Plaintiff/
Counterclaim Defendant,*

v.

BOOKING HOLDINGS INC.,
BOOKING.COM B.V., KAYAK SOFTWARE
CORPORATION, PRICELINE.COM LLC,
and AGODA COMPANY PTE. LTD.,

Defendants,

BOOKING.COM B.V.,

Counterclaim Plaintiff.

C.A. No. 1:20-cv-01191-WBC

**MOTION FOR EXEMPTION OF PERSONS
FROM THE DISTRICT OF DELAWARE’S MAY 15, 2023
STANDING ORDER ON PERSONAL DEVICES**

Plaintiff, Ryanair DAC (herein, “Ryanair”) move for an order to exempt certain persons from the District of Delaware’s May 15, 2023 Standing Order on Proceedings Regarding the Possession and Use of Cameras and Personal Electronic Devices by Visitors to the J. Caleb Boggs Federal Building and United States Courthouse (the “May 15, 2023 Standing Order”). In support of the Motion, Ryanair states as follows:

1. The District of Delaware’s May 15, 2023 Standing Order provides procedures to regulate the possession and use of personal electronic devices by visitors to the J. Caleb Boggs Federal Building and United States Courthouse, which require, inter alia, visitors to place personal electronic devices in a locked pouch provided by U.S. Marshals. Paragraph 4 of the May 15, 2023 Standing Order provides for certain exemptions to the Standing Order.

2. A Pretrial Conference is presently scheduled for July 11, 2024 before the Court (see Order at D.I. 412). Courtroom setup is presently scheduled for Friday, July 12, 2024 at 3:00 p.m. EDT in Courtroom 6A. The trial is currently scheduled in this case for Monday, July 15, 2024 through Friday, July 19, 2024 before Judge William C. Bryson in Courtroom 6A.

3. R. David Donoghue, Anthony J. Fuga, Cynthia A. Gierhart, Ji Mao, and William H. Oliver, III of Holland & Knight LLP, who are all admitted *pro hac vice* in this case, will be in attendance at the pretrial conference scheduled for July 11, 2024 and at the courtroom setup meeting scheduled for July 12, 2024 at 3:00 p.m. EDT in Courtroom 6A. Mr. Donoghue, Mr. Fuga, Ms. Gierhart, Mr. Mao, and Mr. Oliver will all be in attendance at trial scheduled for July 15 through July 19, 2024 and will require access to personal electronic devices and connectors.

4. Rachael E. Covington (paralegal) of Kratz & Barry LLP, Peter Uhlenhake (paralegal) and Jack Stoerger (paralegal) of Holland & Knight LLP will be in attendance to assist at the pretrial conference scheduled for July 11, 2024 and at the courtroom setup meeting scheduled for July 12, 2024 at 3:00 p.m. EDT in Courtroom 6A. Ms. Covington, Mr. Uhlenhake, and Mr. Stoerger will be in attendance at trial scheduled for July 15 through July 19, 2024 and require access to personal electronic devices and connectors. Ms. Covington, Mr. Uhlenhake, and Mr. Stoerger do not meet any of the exemptions to Paragraph 4 of the May 15, 2023 Standing Order.

5. Ruth Comiskey, in-house counsel for Ryanair, will be in attendance at trial scheduled for July 15 through July 19, 2024 and require access to personal electronic devices and connectors. Ms. Comiskey does not meet any of the exemptions to Paragraph 4 of the May 15, 2023 Standing Order.

6. Dara Brady, John Hurley, and Lucasz Stocki, are all representatives of the Plaintiff, Ryanair DAC and will be in attendance at trial scheduled for July 15 through July 19, 2024 and

require access to personal electronic devices and connectors. Mr. Brady, Mr. Hurley, and Mr. Stocki do not meet any of the exemptions to Paragraph 4 of the May 15, 2023 Standing Order.

7. Ryanair's expert witnesses Iain David Lopata and Anthony Vance will be in attendance at trial scheduled for July 15 through July 19, 2024 and require access to personal electronic devices and connectors. Mr. Lopata and Mr. Vance do not meet any of the exemptions to Paragraph 4 of the May 15, 2023 Standing Order.

8. Dalton Roan and Kerry Cashman from Magna Legal Services will be in attendance to assist at the pretrial conference scheduled for July 11, 2024 and at the courtroom setup meeting scheduled for July 12, 2024 at 3:00 p.m. EDT in Courtroom 6A. Mr. Roan and Ms. Cashman will be in attendance at trial scheduled for July 15 through July 19, 2024 and require access to personal electronic devices and connectors. Mr. Roan and Ms. Cashman will be in attendance to assist Ryanair with technology-related issues and presentations. Mr. Roan and Ms. Cashman plan to bring electronic devices and equipment to the Courthouse for trial. Mr. Roan and Ms. Cashman do not meet any of the exemptions to Paragraph 4 of the May 15, 2023 Standing Order.

9. The parties respectfully request that the Court issue an order, in the form attached hereto, to exempt certain persons from the District of Delaware's May 15, 2023 Standing Order.

Dated: July 8, 2024

Respectfully submitted,

KRATZ & BARRY LLP

/s/ R Touhey Myer

R Touhey Myer (#5939)
800 North West Street
Wilmington, DE 19801
(302) 527-9378
tmyer@kratzandbarry.com

Of Counsel:

R. David Donoghue (*pro hac vice*)
Anthony J. Fuga (*pro hac vice*)
HOLLAND & KNIGHT
150 N. Riverside Plaza, Suite 2700
Chicago, IL 60606
(312) 263-3600
david.donoghue@hklaw.com
anthony.fuga@hklaw.com

Cynthia A. Gierhart (*pro hac vice*)
HOLLAND & KNIGHT LLP
800 17th Street NW, Suite 1100
Washington, D.C. 20011
cindy.gierhart@hklaw.com

Ji Mao (*pro hac vice*)
HOLLAND & KNIGHT
31 West 52nd Street
New York, NY 10019
ji.mao@hklaw.com

William H. Oliver, III (*pro hac vice*)
HOLLAND & KNIGHT LLP
10 St. James Avenue, 11th Floor
Boston, MA 02116
william.oliver@hklaw.com

*Attorneys for Plaintiff/Counterclaim
Defendant, Ryanair DAC*